## MICHIGAN DEPARTMENT OF NATURAL RESOURCES

#### INTEROFFICE COMMUNICATION

March 3, 1992

TO:

Steve Sliver, Environmental Engineer, WMD

FROM:

Jan Sealock, Environmental Quality Analyst, WMD

SUBJECT:

Grede Foundries, Inc.

Closure Documentation Report

MID 006 131 890

I have reviewed Grede Foundries' Closure Documentation Report. The following deficiencies have been identified.

- 1) As indicated on page 15 of the Closure Work Plan for the Hazardous Waste Treatment Process (Appendix A), the soil analyses will be compared to background levels using the Gosset Student T-test statistical method. The soil analyses in this case are those collected underneath the semi-trailer transfer area. When comparing this Plan to the Closure Documentation Report, we see that Table 4 on page 33 has background levels for cadmium and lead as the mean plus three standard deviations. This discrepancy must be clarified. Either an amendment must be made to the closure plan or Grede must eliminate the mean + 3 sd and recalculate the results using the Gosset Student T-test. Dave Slayton has indicated to me that the mean + 3 sd is a better statistical analysis.
- Looking once again at page 15 of the Closure Work Plan (Appendix A), it is pointed out that if total cadmium and lead levels are detected in the soil at levels statistically in excess of background but less than hazardous levels, the soils will be taken to a Type II landfill. Looking at Table 6, page 40, it can be seen that 9 total values exceed the mean + 3 sd for lead or cadmium. These confirmation samples have been left in place with no excavation. If the mean + 3 sd is to be the statistical analysis performed, these soils must be excavated in compliance with the Closure Documentation Report.

If you should have any questions, please see me.

cc: Mr. Phil Schrantz, DNR

Ms. De Montgomery, DNR/EPA Reporting Sealuck

## GREDE FOUNDRIES, INC.

EXECUTIVE OFFICES

July 19, 1985

BEGEOVED

Mr. George Hamper, 5HS-13 Region V, U. S. E. I. A. 230 South Dearborn Street Chicago, Illinois 60606 JUL 26 1985

SOLIO WASTE BRANCH
U.S. EPA, REGION V

Dear Mr. Hamper:

Grede Foundries, Inc. Iron Mountain Foundry E.P.A. ID #MID 006131890

Mr. Gary Ertel of our financial group spoke with you and Mr. Gold of the E.P.A., and with Mr. Charles Riley and Mr. Tom Polasik of the Michigan DNR regarding financial assurance requirements for our Iron Mountain operation. Apparently the feeling is that we postpone this work until our exemption is acted upon.

We will take this suggestion, and will look forward to hearing from you or the Michigan DNR regarding the action to be taken.

Thank you for your assistance.

Sincerely,

James T. Williams Vice President

JTW: CW

cc: Andrea G. Stewart
Michigan Department of Natural Resources
P.O. Box 128
Roscommon, Michigan 48653

#### GREDE FOUNDRIES, INC.

EXECUTIVE OFFICES

April 29, 1983

Mr. William H. Miner, Chief Technical, Permits and Compliance Section U. S. Environmental Protection Agency 230 South Dearborn Street Chicago, Illinois 60604

RECEIVED MAY 2 1983

Dear Mr. Miner:

Grede Foundries, Inc. EPA ID No. MID 006131890

WASTE MANAGEMENT BRANCH

As requested in your letter of March 31, 1983, we are required to provide proof to the US EPA of financial assurance for closure of this facility. Cost estimates for closure of this treatment facility including cleanup of any storage bins and mixing equipment are \$1,500.

Enclosed find copy of submittal to the Wisconsin Department of Natural Resources which demonstrates Grede Foundries' ability to meet the financial responsibility test for closure costs of the landfill site substantially in excess of the closure cost for this facility.

As this information and report has been developed to reach substantially the same test as required under the EPA, and as the closure cost of the particular facility in question at \$1,500 are less than the cost which would be required to provide a separate opinion from our Certified Public Accountant for this facility, we ask that you consider the enclosed as substantially meeting the requirements of the Federal Regulations.

Very truly yours,

James T. Williams Vice President

cw Enc.

cc: RCRA Activities William Muno



#### GREDE FOUNDRIES, INC.

GENERAL OFFICES
P. D. BOX 26499
MILWAUKEE, WISCONSIN 53226
TELEPHONE (414) 257-3600

BRAY IRDN

SPRING CITY FOUNDRY-WAUKESHA, WISCONSIN

IRON MOUNTAIN FOUNDRY-KINGSFORD, MICHIGAN

MUTCHINSON FOUNDRY-HUTCHINSON, KANSAS

DUCTILE IRDN

LIBERTY FOUNDRY-WAUWATOSA, WISCONSIN

REEDSBURG FOUNDRY-MEEDSSURG, WISCONSIN

WICHITA FOUNDRY-WICHITA, KANSAS

STEEL

MILWAUKEE STEEL FOUNDRY-MILWAUKEE, WISCONSIN

SPECIAL SERVICES

HARTMANN INDUSTRIAL PRODUCTS-MUTCHINSON, KANSAS

SHORT RUN SPECIALTY FOUNDRY-MILWAUKEE, WISCONSIN

TOOLING CENTER-MILWAUKEE, WISCONSIN

November 10, 1932

Mr. Robert Krill, P.E., Director Solid Waste Bureau Wisconsin Department of Natural Resources 101 S. Webster Street P.O. Box 7921 Madison, WI 53702

Dear Mr. Krill:

This letter contains information submitted as part of the initial license application for licensing proposed Grede Foundries, Inc. landfill at Reedsburg, Sauk County, Wisconsin.

Grede Foundries, Inc. is a closely held private corporation and does not publish an annual report. The information supplied to general credit inquiries is of a very limited nature and includes primarily a reference to Dun & Bradstreet by whom we are rated 4Al.

However, to meet the requirements of Section 144.443(4) Wisconsin Statutes, enclosed herein find a summary of the test embodied in Section 144.443(6), which demonstrates Grede Foundries' ability to meet the financial responsibility net worth requirements. Calculations of the figures was done in conjunction with calculations and explanation provided by DNR Analyst Vera Starch and your calculation of the test should, therefore, produce similiar figures.

Enclosed also is the opinion of our Certified Public Accountant as required by Section 144.443(4). I believe the information provided will allow you to issue a determination that Grede Foundries complies with the minimum financial responsibility standards.

Sincerely

J. L. Phelan Secretary

JLP:cw Enc.

### ARTHUR ANDERSEN & Co.

777 EAST WISCONSIN AVENUE P. O. Box 1215 MILWAUKEE, WISCONSIN 53201 (414) 271-5100 November 12, 1982

Mr. J. L. Phelan, Secretary Grede Foundries, Inc. Post Office Box 26499 Milwaukee, Wisconsin

We have examined the balance sheets of Grede Foundries, Inc. (the "Company"), as of October 31, 1981, November 1, 1980, November 3, 1979, October 28, 1978, and October 29, 1977, and the related statements of income, and changes in financial position for each of the five years then ended, and have expressed unqualified opinions on those financial statements. Our most recent report was dated November 23, 1981, and we have not performed any auditing procedures since that date. Our examinations were made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

At your request, we have read your letter dated November 10, 1982, to the Director of Solid Waste Bureau, Department of Natural Resources, State of Wisconsin, supporting the Company's use of the net worth method of establishing proof of financial responsibility, as specified in Subpart 4, Section 144.443 of Chapter 374, Laws of 1981. As further required by such regulations, we have compared the data specified in Section I of your letter as having been derived from the independently audited financial statements referred to above with the corresponding amounts in such financial statements. In connection with this procedure, no matters came to our attention that caused us to believe that the specified data should be adjusted.

As a result of our examination of the financial statements as of and for the year ended October 31, 1981, it was our opinion as of November 23, 1981, that such financial statements include provision for or disclosure of all loss contingencies and contingent liabilities necessary to present fairly the financial position of the Company in conformity with generally accepted accounting principles.

This report is furnished solely for the use of the Company and the Company's distribution to the Director of Solid Waste Bureau and is not to be used for any other purpose.

Very truly yours,

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# GREDE FOUNDRIES, INC. LANDFILL NET WORTH TES

DESCRIPTION	YEAR			ب فيقد عليه عليه عليه عليه عليه بهم يقوم بيمة بيمة عليه عليه عليه عليه عليه عليه عليه عليه	
	77	78	79	80	81
SECTION I:DATA DERIVED FROM FINANCIAL STATEMENTS					
TOTAL ASSETS				53683000	61667000
INTANGIBLE ASSETS			•	0	0
NET FIXED ASSETS				26540000	24012000
TOTAL LIABILITIES				20169000	24202000
LONG-TERM DÉBT PAYMENTS			-	940000	994000
WORKING CAPITAL PROVIDED FROM OPERATIONS	8001000	9132000	10521000	4920000	11008000
INTEREST EXPENSE				991000	1122000
RENTAL EXPENSE				1934000	1773000
CAPITAL EXPENDITURES	6596000	5227000	10690000	7240000	3828000
DIVIDENDS	409000	506000	671000	698000	465000
EFFECTIVE COMBINED TAX RATE .43					
NGIBLE ASSETS				53683000	61667000
NET WORTH	:			33514000	37465000
SECTION II: RATIOS CALCULATED FROM ABOVE DATA					
TAX FACTOR 1.7543860					
CLOSURE PLUS LONG TERM CARE (CALCULATED BY VERA STARCH) 382115					
REFERENCE		ніні	MUM		
144.443 NET WORTH TO CLOSURE 6	AND LONG	6 OR E	ETTER		98.05
144.443 EXCESS OF NET WORTH O			10000000	0 27465000	
144.443 NET FIXED ASSETS TO TO (6)(d) ASSETS RATIO	ÒTAL.	0.3 OR	BETTER		0.39
144.443 WORKING CAPITAL TO TO (6)(e) LIABILITIES	TAL	0.1 OR	BETTER		0.45
144.443 TOTAL LIABILITIES TO (6)(f) RATIO	NET WORTH	1.5 OR	LESS		0.65
144.443 CREDIT WORTHINESS (6)(g)		2.0 OR	BETTER		3.00
144.443 SELF FINANCING (6)(h)	1.15	1.65	0.92	0.58	2.75
AVERAGE LAST FIVE Y	EARS	0.8 OR	BETTER		1.41